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Attorneys for Defendant
ACTION MOTORSPORTS OF TAHOE, INC.
(improperly named as ACTION WATERSPORTS
OF TAHOE)

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

SUZANNE NAVONE,

Plaintiff,

v.

ACTION WATERSPORTS OF TAHOE, CAMP
RICHARDSON RESORT, INC., M/V ROE
(A.K.A. M/V WATER TAXI), its engines,
tackle, equipment, furnishings, and machinery,
in rem, and MARK TAYLOR, JAMES
GRAHAM, *individuals* and Does 1-20,

Defendants.

Case No. 2:20-cv-01351-JAM-JDP

**STIPULATION TO EXTEND TIME FOR
DEFENDANT TO RESPOND TO
PLAINTIFF'S COMPLAINT; ORDER**

Complaint Filed: July 6, 2020
Trial Date: TBD

IT IS HEREBY STIPULATED by and between the parties hereto through their respective attorneys that Defendant ACTION MOTORSPORTS OF TAHOE, INC. (improperly named as Action Watersports of Tahoe), may have additional time of 28 days within which to answer or otherwise respond to Plaintiff SUZANNE NAVONE's Complaint. Therefore, the last day for Defendant to answer or otherwise respond to Plaintiff's Complaint is September 22, 2023. If the Court grants this extension, the date would be October 27, 2022.

Good cause exists for this extension as defense counsel has just been assigned to this case and requires time to become knowledgeable about the case to prepare an initial pleading or response.

1 This document is being electronically filed through the Court's ECF System. In this regard,
2 counsel for Defendant hereby attests that (1) the content of this document is acceptable to all persons
3 required to sign the document; (2) Plaintiff's counsel has concurred with the filing of this document;
4 and (3) a record supporting this concurrence is available for inspection or production if so ordered.

5 Respectfully submitted,

6 DATED: September 22, 2023

KENNEDYS CMK LLP

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8 By: /s/ Pamela L. Schultz

PAMELA L. SCHULTZ

Attorneys for Defendant

ACTION MOTORSPORTS OF TAHOE, INC.

9
10 DATED: September 20, 2023

BIRNBERG & ASSOCIATES

11
12 By: /s/ Cory A. Birnberg (as authorized on 9/20/23)

CORY A. BIRNBERG

Attorneys for Plaintiff

SUZANNE NAVONE

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16 **ORDER**

17 Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendant should answer or
18 otherwise respond to Plaintiff's Complaint on or before **October 27, 2023**.

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20 Dated: September 28, 2023

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ

SENIOR UNITED STATES DISTRICT JUDGE